

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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JOSHUA CHATWIN,	: CIVIL NO. 2:14-cv-375
Plaintiff,	: 30(b)(6) DEPOSITION OF:
	: DRAPER CITY POLICE
v.	:
	: REPRESENTED BY DEPUTY
DRAPER CITY; DRAPER CITY	: POLICE CHIEF JOHN EINING
POLICE DEPARTMENT;	
OFFICER J. PATTERSON, in	: TAKEN: December 8, 2015
his individual and	
official capacity;	: Judge Dale A. Kimball
OFFICER HEATHER BAUGH,	
in her individual and	
official capacity;	
OFFICER DAVID HARRIS, in	
his individual and	
official capacity;	
OFFICER KURT IMIG, in	
his individual capacity;	
SUPERVISOR TBA; and JOHN	
DOES 1-10,	
Defendants.	

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30(b)(6) Deposition of DRAPER CITY POLICE,
represented by Deputy Police Chief John Eining, taken
on behalf of the plaintiff, at 201 South Main Street,
Suite 1300, Salt Lake City, Utah, before PHOEBE S.
MOORHEAD, Certified Shorthand Reporter for the State
of Utah, pursuant to Notice.

1 there any information that we've requested in that
2 amended notice that is not known or reasonably available
3 to Draper City?

4 MR. HAMILTON: And before the witness answers,
5 I think this is as good a time as any to state that we
6 have filed formal objections. We sent a meet and confer
7 letter with you. So subject to those objections, he's
8 here to testify. But we did have some issues, as you
9 know, with the -- even the amended notice. So -- but
10 he's ready to testify, subject to those objections.

11 BY MS. MARCY:

12 Q. Okay. So what I'm asking -- I'm asking you.
13 All right? So your attorney has made the objection.

14 What I'm asking is: Is there anything in the
15 amended notice, any of these questions, where you read
16 the question, and you feel like there's anything that is
17 not known to Draper City or was not reasonably available
18 to Draper City to provide today?

19 MR. HAMILTON: Objection. Form.

20 THE WITNESS: Okay. So I do believe that
21 there is probably some documentation in the earlier
22 years that we did not have and could not produce, based
23 on the fact that we had a change in our training
24 coordinators at the time.

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